# IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

IN RE:	§
	§ CASE NO. 21-10436-tmd
MARY BRENNA RYLEE,	§
	§ CHAPTER 11
Debtor.	§ (SUBCHAPTER V)
	§ Judge Tony M. Davis
	WebEx Confirmation Hearing on Debtor's Proposed Subchapter V Plan of Reorganization [Dkt. No. 93]
	8 October 25, 2021 at 2:45 p.m.

### **DEBTOR'S WITNESS AND EXHIBIT LIST**

#### I. WITNESSES

- 1. Mary Brenna Rylee, Debtor (direct examination by declaration)
- 2. Erik White, Financial Advisor

The Debtor reserves the right to cross-examine any witness identified by any other party and to call rebuttal witnesses, if necessary.

#### II. EXHIBITS

Exhibit No.	Description	M A R K E D	O F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
Debtor-1	Debtor's Proposed Subchapter V Plan of Reorganization [Dkt. No. 93]						
Debtor-2	Ballot Summary with Ballots [Dkt. No. 111-1]						
Debtor-3	Financial Projections [Dkt. No. 93 at 40]						
Debtor-4	Liquidation Analysis [Dkt. No. 93 at 41]						

Exhibit No.	Description	M A R K E D	O F F E R D	O B J E C	A D M I T	D A T E	Disposition After Trial
Debtor-5	Declaration of Mary Brenna Rylee						
	Any exhibits listed by any other party						
	Any exhibits necessary for rebuttal or impeachment						

In addition, the Debtor designates any pleadings, including exhibits, filed in this Bankruptcy Case and any exhibits designated by any other party.

The Debtor reserves the right to amend or supplement this Witness and Exhibit List.

Dated: October 21, 2021 Respectfully submitted,

#### HUSCH BLACKWELL LLP

By: <u>/s/ Jameson J. Watts</u>

Lynn Hamilton Butler State Bar No. 03527350

Jameson J. Watts

State Bar No. 24079552

111 Congress Avenue, Suite 1400

Austin, Texas 78701 Tel: (512) 472-5456

Fax: (512) 479-1101

lynn.Butler@huschblackwell.com jameson.watts@huschblackwell.com

COUNSEL FOR DEBTOR MARY BRENNA RYLEE

#### **CERTIFICATE OF SERVICE**

I certify that on October 21, 2021, a copy of this document was served upon the parties registered to receive notice via ECF as indicated below. I further certify that on October 22, 2021, a copy of this document was served upon the parties not registered to receive notice via ECF as indicated below. Exhibits will be delivered electronically to those parties receiving ECF notification.

/s/ Jameson J. Watts
Jameson J. Watts

#### Notice will be served via ECF to:

Mary Brenna Rylee c/o Jameson J. Watts Husch Blackwell LLP 111 Congress Avenue, Suite 1400 Austin, TX 78701 Email: Jameson.watts@huschblackwell.com

American Momentum Bank c/o Bruce Ruzinsky Jackson Walker LLP 1401 McKinney Street, Suite 1900 Houston, TX 77010

American Momentum Bank c/o Jennifer F. Wertz 100 Congress Avenue, Suite 1100 Austin, TX 78701 Email: jwertz@jw.com

Email: bruzinsky@jw.com

Ector CAD c/o Don Stecker Linebarger Goggan Blair & Sampson, LLP 112 E. Pecan Street, Suite 2200 San Antonio, TX 78205 Email: sanantonio.bankruptcy@publicans.com Michael G. Rylee c/o Fareed Iqbal Kaisani Platt Cheema Richmond PLLC 1201 N. Riverfront Blvd., Suite 150 Dallas, TX 75207 Email: fkaisani@pcrfirm.com

Southstar Bank, S.S.B. c/o Richard T. Chapman Anderson, Smith, Null & Stofer, L.L.P. 100 West Goodwin, Suite 700 Post Office Box 1969 Victoria, TX 77902 Email: rchapman@andersonsmith.com

Subchapter V Trustee c/o Michael Colvard Weston Center 112 East Pecan Street, Suite 1616 San Antonio, TX 78205 Email: mcolvard @mdtlaw.com

Travis County c/o Jason A. Starks Travis County Attorneys' Office4 PO Box 1748 Austin, TX 78767-1748 Email: Jason.starks@traviscountytx.gov United States Department of Justice Office of the United States Trustee c/o J. Casey Roy, Trial Attorney 903 San Jacinto Blvd., Suite 230 Austin, TX 78701 Email: Casey.Roy@usdoj.gov

United States Trustee – AU12 903 San Jacinto Blvd., Suite 230 Austin, TX 78701 Email: ustpregion07.au.ecf@usdoj.gov

GTG Solutions, Inc. c/o Frank B. Lyon 3508 Far West Blvd., Suite 170 Austin, TX 78731 Frank@franklyon.com

## Notice will be mailed via United States first-class mail to:

Briggs & Veselka Co c/o Edward Fowler 901 S. Mopac Expressway Bldg. II, Suite 450 Austin, TX 78746

Capital One Bank USA NA PO Box 31293 Salt Lake City, UT 84131-1293 Community National Bank 1502 Avenue M Hondo, TX 78861

Community National Bank 2659 John Ben Shepperd Pkwy. Odessa, TX 79762

Friday Milner Lambert Turner, PLLC 3401 Glenview Avenue Austin, TX 78703

GTG Solutions, Inc. c/o Bob. J. Shelton P.C. 5103 Chad Drive Arlington, TX 76017

GTG Solutions, Inc. c/o Anna Hand-Registered Agent 500 West Sherman Chico, TX 76431

Haygood Law Firm c/o Lane Haygood 522 North Grant Avenue Odessa, TX 79761

Internal Revenue Service Special Procedures Stop 5022 AUS 300 East 8th Street Austin, TX 78701

Internal Revenue Service Centralized Insolvency Operations P. O. Box 7346 Philadelphia, PA 19101-7346

James Firm PLLC c/o Amanda James 1316 5th Avenue Fort Worth, TX 76104 John Manicom PO Box 341420 Austin, TX 78734

Kelly L. Burris Cordell & Cordell PC 301 Congress Avenue, Suite 1800 Austin, TX 78701

Michael G. Rylee 101 Colorado, Apt. 3007 Austin, TX 78701-4292

Texas Comptroller of Public Accounts Revenue Acctg Div - Bankruptcy Section P.O. Box 13528 Austin, TX 78711-3528

Texas Workforce Commission Tax-Collections 101 E. 15th Street Austin, TX 78778-0001

Travis County Tax Assessor-Collector P.O. Box 149326 Austin, TX 78714